

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA )  
v. ) Criminal No. 12-92  
RICHARD BUSH )  
MAYANK MISHRA )  
WILLIS WHEELER ) *Ex Parte and Under Seal*

## **GOVERNMENT'S MOTION TO CHANGE DATE FOR HEARING ON PRETRIAL MOTIONS**

AND NOW comes the United States of America, through its counsel, David J. Hickton, United States Attorney for the Western District of Pennsylvania, and Brendan T. Conway, Assistant United States Attorney for said district, and respectfully submits its Motion to Change Date for Hearing on Pretrial Motions. For the reasons set forth below, the Court should grant the government's motion and change the date for the hearing on pretrial motions.

The Court set a hearing on pretrial motions for October 23, 2014. To resolve some of those motions, the government intends to present the testimony of Federal Bureau of Investigation Special Agent Michael O'Mahoney. Special Agent O'Mahoney is prepared to testify that the defendant, Mayank Mishra, consented to the search of a residence and voluntarily signed a consent form so indicating.

Also on October 23, 2014, the FBI, in conjunction with other federal and local law enforcement officials, intends to arrest dozens of violent individuals and execute numerous search

warrants as the culmination of an extensive investigation of drug trafficking activity. Special Agent O'Mahoney is the primary case agent for the case that resulted in the operation, and therefore his presence is necessary. The FBI could change the date of the operation, but much planning and coordination has already occurred with the October 23, 2014 date in mind.

WHEREFORE, for the reasons set forth below, the Court should grant the government's motion and change the date of the hearing on pretrial motions to a date convenient for the Court and the parties.

Respectfully submitted,

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